

Massachusetts Climate Action Network

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www.massclimateaction.org

Boston Climate Action Network
Cambridge Climate Action
Cape Ann Climate Change Network
Clean Water Action
Climate Change Action Brookline
Concord Green Team
Green Newburyport
HealthLink
Mass. Energy Consumers Alliance
Mass. PIRG

Medford Climate Action Network
Newburyport Climate Action
Newton Green Decade Coalition
Northampton Citizens for Climate Protection
Salem Alliance for the Environment
Somerville Climate Action
Sustainable Arlington
Sustainable Lexington
Watertown Citizens for Environmental Safety
Westwood Environmental Coalition

Petition to Intervene: DTE 03-2, Mass. Electric Energy Efficiency Plan

July 2, 2003

Mary L. Cottrell
Secretary, Dept. of Telecommunications and Energy
One South Station
Boston, MA 02110

Dear Secretary Cottrell:

This original, and the five enclosed copies, constitutes the Petition to Intervene of Massachusetts Climate Action Network ("MCAN") into DTE 03-2, "Joint Petition of Massachusetts Electric Company and Nantucket Electric Company, pursuant to G.L. c.25, section 19, G.L. c. 25A, section 11G, and G.L. c. 164, section 17A for approval by the Department of Telecommunications and Energy of its 2003 Energy Efficiency Plan, including a proposal for financial assistance to municipal energy efficiency projects."

As required, we have also sent a copy of this petition to Amy Rabinowitz, Esq., at Massachusetts Electric Company; and we are sending a copy via e-mail to: dte.efiling@state.ma.us.

We seek to intervene because:

- 1) We are a member of the Non-Utility Parties (NUPs), which along with Massachusetts Electric and the other electric utilities in Massachusetts, make up the Efficiency Collaboratives. The Collaboratives have oversight responsibilities for the energy efficiency programs operated by the utilities.
- 2) Our primary organizational purpose, to reduce emissions of greenhouse gases in Massachusetts, depends greatly on improving the efficiency of energy use.
- 3) As listed on our letterhead, our member groups include several statewide organizations, and local organizations throughout the state, all of which are greatly concerned with improving energy efficiency in the state.

4) Several of our local member groups are within Mass. Electric's service territory, including Medford Climate Action Network, Green Newburyport, Salem Alliance for the Environment, Cape Ann Climate Change Network, and Northampton Citizens for Climate Protection.

5) A primary function of MCAN and our local groups is to work with municipal governments, through the "Cities for Climate Protection" campaign, to reduce use of fossil fuel energy, both through greater efficiency and conversion to renewable energy. Thus, we are particularly interested in Mass. Electric's programs that service municipal governments, including their current proposal to extend on-bill financing to all municipal efficiency projects.

6) MCAN, and several of our member groups, including Medford Climate Action Network and Salem Alliance for the Environment in Mass. Electric's service territory, are engaged in outreach to promote residential energy efficiency measures. Thus, we are concerned with optimizing the effectiveness of Mass. Electric's programs that service the residential sector.

MCAN requests the right to participate in all aspects of this docket, including the presentation of testimony, witnesses, and evidence; cross-examination of witnesses, and the presentation of arguments orally and through briefs.

I am the contact person for this Petition. I can be reached at the address and phone number above, or via e-mail at: marc@mbreslow.org.

If there is any problem with this Petition, please notify me immediately so that I may correct it prior to the July 10 filing deadline.

Yours truly,

Marc Breslow, Ph.D.
Director and Co-Chair